EXHIBIT 41

IN THE UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF NEW YORK

- - - - -

LEIGHTON TECHNOLOGIES, LLC,)

plaintiff,)

vs.) Case No.

) 04 Civ. 02496 (CM)

OBERTHUR CARD SYSTEMS, S.A.)

and OBERTHUR CARD SYSTEMS)

OF AMERICA CORP.,)

defendants.)

- - - - -

(Volume III - pages 522 through 875)

- - - - -

Continued videotaped deposition of KEITH LEIGHTON, a witness herein, called by the defendants as if upon cross-examination, and taken before David J. Collier, RPR, Notary Public within and for the State of Ohio, pursuant to Notice of Deposition and pursuant to the further stipulations of counsel herein contained, on Monday, the 23rd day of October, 2006 at 8:02 a.m., at the offices of Tackla & Associates, 1020 Ohio Savings Plaza, City of Cleveland, County of Cuyahoga and the State of Ohio.

A Yes.
Q Did the heating step follow the -- I'm sorry. Did the cooling step follow the heating step?
A Yes.
Q Was it immediate?
A They had a problem with their laminator because they modified their rams and the plumbing from the pump.
Q All right. Yeah. You said this at your earlier deposition, it was -- it was a printed circuit board laminator; is that right?
A Right. That's correct.
Q And it was designed so that the pressure during cooling would be less than during heating, generally?
A We didn't actually know the pressures.
Q Okay.
A Because they have a bar pressure on that laminator that they could only get a pump pressure reading, but on this laminator that Motorola had, they had the hot side a large ram, the cold side was a smaller ram, and those should actually be reversed for card manufacturing purpose.

EXHIBIT 42

IN THE UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF NEW YORK

- - - - -

LEIGHTON TECHNOLOGIES, LLC,)

plaintiff,)

vs.) Case No.

) 04 Civ. 02496 (CM)

OBERTHUR CARD SYSTEMS, S.A.)

and OBERTHUR CARD SYSTEMS)

OF AMERICA CORP.,)

defendants.)

- - - - -

(Volume III - pages 522 through 875)

- - - - -

Continued videotaped deposition of KEITH LEIGHTON, a witness herein, called by the defendants as if upon cross-examination, and taken before David J. Collier, RPR, Notary Public within and for the State of Ohio, pursuant to Notice of Deposition and pursuant to the further stipulations of counsel herein contained, on Monday, the 23rd day of October, 2006 at 8:02 a.m., at the offices of Tackla & Associates, 1020 Ohio Savings Plaza, City of Cleveland, County of Cuyahoga and the State of Ohio.

"pump pressure"?

A Correct.

Q So the pump on the press could apply up to another 1,000 pounds or so on top of the weight of all the platens?

A Right. Having a large ram on the hot side, when you start to raise, the pumped fluid goes into the ram, it's going to go to the biggest opening first.

Q Okay.

A Lesser resistance. The cold side, unfortunately, raised up slower than the hot side did in closing the laminator, then I had to equalize. So I to this day have no idea what the pressures were on the hot or the cold side.

Q Okay. But you understand --

A Or the bar pressures.

Q You understand that -- I'm not a -- I'm a chemical engineer but I'm not a -- I've never done anything in this field, okay? So you have to help me understand the ranges of the magnitudes of what we're talking about, okay? And you have to help the judge and the jury understand the kind of numbers we're dealing with. Do you understand that?

Vietnamese, at Motorola they have all -- when they put a notice on the board, it's in about six languages so everybody can understand it.

Q Okay. Now, the rams were of different sizes, correct?

A Correct.

Q And the -- is the amount of pressure that's applied in either side a function of the size of the ram?

A Yes.

Q And how much bigger was the ram on the cold side than the hot side?

A I don't remember that.

Q Was it ten times as big?

A I can't tell you that.

Q Okay. Even though the rams were of different sizes, meaning that a bigger ram could apply more pressure, right, was it possible in the Burkle laminator to just not apply as much pressure using a larger ram and max out the ram on the cold side?

A You would -- they had a tank containing the hydraulic fluid, a single tank containing your fluid, you have a pump in there that is pumping the pressure to the rams, it's going to fill the

most -- less resistance first, which would be the large ram, it would flow in there before it will fill up the cold side it's going to be taking all the fluid on the hot side first. And that was proven by the fact that the hot ram closed first and it was a bigger ram. There was a dwell time waiting for the cold ram to shut or come up to pressure.

Q Okay. So are you saying that it was physically impossible, given the size of the rams and the way the hydraulic system worked, to have the pressure on the cooling side be greater than the pressure on the heating side in the Burkle laminator at Motorola?

A I'm not one of physics, but in my own mind it was much less, but it did manage to close and cool down the product, but I'm not sure what the surface pressure was on that cold side.

Q Okay. And whatever temperature you were able -- I'm sorry. Whatever temperature and pressure you were able to achieve on the cold side of the Burkle laminator, the highest success rate you got was 15 out of 24?

A I don't believe it had any relationship to the cold side at all. I think they were

EXHIBIT 43

IN THE UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF NEW YORK

- - - - -

LEIGHTON TECHNOLOGIES, LLC,)

plaintiff,)

vs.) Case No.

) 04 Civ. 02496 (CM)

OBERTHUR CARD SYSTEMS, S.A.)

and OBERTHUR CARD SYSTEMS)

OF AMERICA CORP.,)

defendants.)

- - - - -

(Volume III - pages 522 through 875)

- - - - -

Continued videotaped deposition of KEITH LEIGHTON, a witness herein, called by the defendants as if upon cross-examination, and taken before David J. Collier, RPR, Notary Public within and for the State of Ohio, pursuant to Notice of Deposition and pursuant to the further stipulations of counsel herein contained, on Monday, the 23rd day of October, 2006 at 8:02 a.m., at the offices of Tackla & Associates, 1020 Ohio Savings Plaza, City of Cleveland, County of Cuyahoga and the State of Ohio.

A Because they were continually working on their laminator. They had the Burkle people out there while I was there, the circuit boards burned out and --

Q But they didn't tell you that they knew that the rams were reversed as to what they should be?

A No.

Q But you realized that when you got there --

A After I got there.

Q -- and you told them, and they agreed with you, of course.

A Right.

Q And they were in the process of trying to fix that problem?

A That's correct.

Q And did you help them fix that problem as well?

A No.

Q You didn't?

A No.

Q Okay. But you wanted them to be able to have their press have at least equal pressure during the heating and cooling?

A I tried to deal with what they had. They

had a service man from Burkle doing everything that they asked him to do.

Q Right.

A And he told them, junk it, get a plastic card laminator.

Q Right. But they didn't junk it, right?

A That's correct.

Q That's the laminator that you were forced to use when you were consulting for Motorola?

A That's all they had when I was there.

Q And you knew one problem that you had to fix was the pressure during heating and cooling at least had to be the same, the ram pressures had to be the same, right, or else you weren't going to make an acceptable card?

A In working with it, we tried different tests.

Q Okay. And that was one test you tried?

A That's one test we tried, yes.

Q Right. Because that's exactly what you said earlier, that's why --

A Right.

Q -- that printed circuit board press was not good for making cards, because the pressures had to be at least the same in the heating and

EXHIBIT 44

IN THE UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF NEW YORK

- - - - -

LEIGHTON TECHNOLOGIES, LLC,)

plaintiff,)

vs.) Case No.

) 04 Civ. 02496 (CM)

OBERTHUR CARD SYSTEMS, S.A.)

and OBERTHUR CARD SYSTEMS)

OF AMERICA CORP.,)

defendants.)

- - - - -

(Volume III - pages 522 through 875)

- - - - -

Continued videotaped deposition of KEITH LEIGHTON, a witness herein, called by the defendants as if upon cross-examination, and taken before David J. Collier, RPR, Notary Public within and for the State of Ohio, pursuant to Notice of Deposition and pursuant to the further stipulations of counsel herein contained, on Monday, the 23rd day of October, 2006 at 8:02 a.m., at the offices of Tackla & Associates, 1020 Ohio Savings Plaza, City of Cleveland, County of Cuyahoga and the State of Ohio.

A Because they incorporated that into a soft gel plastic.
Q Okay. And let's -- that was the next step, the inlay of the chip and the coil-wound antenna were incorporated into a gel plastic?
A Right. That's correct.
Q And how was that done?
A I'm not sure of that.
Q And what did it look like after it was incorporated in a gel plastic? Did it look like a --
A It looked like a soft pliable dime-sized inlay that they pressed in by hand.
Q And do you remember the dimensions of the inlay -- well, you just called the antenna and chip incorporated in a gel as the inlay. That's still --
A Yes.
Q You're building up the inlay; is that --
A That's right.
Q -- what you're saying?
Okay. So the first building blocks are the chip and the antenna and then they added this gel around it?
A Right. At the time I was not involved in

encapsulating that into a gel. This is something that was brought to me. I'm not sure who did that. That could have been done at Motorola.

Q Yeah. That's fine. I'm not asking you that. I'm just asking for your memory of it. I mean, you saw it and you worked with it; is that right?

A Right.

Q You saw the dime --

A For a short period of time. Yes.

Q Yeah. You saw the dime-sized --

A Right.

Q -- coil and chip --

A Right.

Q -- in a gel, right, at the time?

A Right. That's -- that's what they were using. Then they hand -- handed me --

Q Let me -- let me just keep asking you the questions.

A Sure. Okay.

Q I want to get out whatever you want to say, but I don't want to lose the train of -- my own train of thought, okay?

A Okay.

Q So do you remember how thick the dime-sized inlay was after --
A No.
Q -- it was incorporated in the gel?
A No.
Q Do you remember about how thick it was?
A No.
Q Do you remember if it was thicker or thinner than an actual dime?
A I can't even honestly say that.
Q Okay. And --
A 15 years ago.
Q Right. That's perfectly fine. I just want to get your best memory, okay?
A Um-hum.
Q What was the next step in the process, as you understood it, when Motorola was making this first dime-sized antenna inlay that they asked you to work on? You've drawn a PVC sheet; is that right?
A Correct.
Q After the chip and antenna were incorporated in the gel, were they placed in the PVC sheet?
A That's correct.

Q How were they placed in the sheet, do you remember?
A They placed them in by hand --
Q Okay.
A -- to my knowledge.
Q That was the next step?
A I never followed their manufacturing process of doing this.
Q Okay. You had a general understanding though?
A Yeah. They showed me the sheets of how they were doing it. I never watched them manufacture that card. They provided me, as I started to say, with some small dime size, without the gel, trying to -- thinking I could come up with a different process.
Q Okay.
A Because they were not satisfied with what they were doing.
Q Okay. And then they put -- they put the gelled inlay into the PVC sheet; is that right?
A That's what they were doing, yes.
Q Do you know, did they glue it or they just placed it in there?
A I'm not sure.

Q Okay. Did you work with this configuration at all?
A No.
Q You never laminated a card with this structure?
A No.
Q Okay. So if you can just finish up with your understanding of what other layers Motorola added to this inlay that we're looking at. You -- you talked about another sheet that they put over it with printed material?
A Right. I'll illustrate that by putting -- let's see. I'll draw another sheet here. They had their inlay sheet, they had a bottom sheet beneath that to encapsulate it.
Q And was there printing on the sheets, you said?
A Yes, there was.
Q On both the top and bottom?
A I don't recall whether there's anything -- I think that was blank on the bottom. The top sheet had their logo, Motorola's logo on the top.
Q Okay.
A It had a gray background.

EXHIBIT 45

IN THE UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF NEW YORK

- - - - -

LEIGHTON TECHNOLOGIES, LLC,)

plaintiff,)

vs.) Case No.

) 04 Civ. 02496 (CM)

OBERTHUR CARD SYSTEMS, S.A.)

and OBERTHUR CARD SYSTEMS)

OF AMERICA CORP.,)

defendants.)

- - - - -

(Volume III - pages 522 through 875)

- - - - -

Continued videotaped deposition of KEITH LEIGHTON, a witness herein, called by the defendants as if upon cross-examination, and taken before David J. Collier, RPR, Notary Public within and for the State of Ohio, pursuant to Notice of Deposition and pursuant to the further stipulations of counsel herein contained, on Monday, the 23rd day of October, 2006 at 8:02 a.m., at the offices of Tackla & Associates, 1020 Ohio Savings Plaza, City of Cleveland, County of Cuyahoga and the State of Ohio.

destroyed immediately as soon as they closed the ram on the hot side.

Q Okay.

A That's my opinion. I don't -- I can't prove that.

Q Okay. Well, let's explore that a little bit.

You said that the best rate you got was 15 out of 24, right? At some point before that you got a lower success rate, right? It got better over time as you worked.

A Yeah.

Q Did these tests, right?

A Um-hum. I improved the longer I worked there.

Q Right. What in your mind led to the increased or improved results over time? What changes in the process did you make that helped to increase the success rate?

A Increase of pressure and changing the thickness of the pre-lams, of being able to go in there with thicker plastic.

Q Okay. Why did the thicker plastic -- did that help to make sure that the chip wouldn't poke through and damage --

A That's correct.
Q -- the platen?
A That's correct.
Q Or the steel?
A Or poke through and destroy the chip. If it shows through the pre-lam, it would be done.
Q Okay. And how -- and, I'm sorry, you also said increase the --
A I increased the temperature out there of temperatures that they weren't doing prior to my coming out there.
Q Okay. You increased the temperature during the heating phase.
A Right.
Q Okay. So in your mind those two factors, increasing the temperature and increasing the thickness of the core sheets, allowed you to make improved cards with embedded electronic elements?
A I got a smoother card but I might have been destroying chips with both temperature and pressure.
Q Okay. But your rate of destroying the chips went down, in other words, you destroyed fewer chips the more you made experimental runs

at Motorola?
A I can't pin that because I did not have the number of electronics to even play with.
Q Okay.
A I could get approximately -- when I used two 24 sheets containing electronics, and they'd give me 100 of them a day, you could see how many times I had to test.
Q Right. But the best result you ever got was 15 out of 24, right?
A Correct.
Q And a card isn't much good with an electronic element if the electronics are squashed, right?
A Correct.
Q So those were two goals you had, right, to make a thin flat card, right, smooth surface, right?
A It wasn't thin. It was a flat card.
Q Okay.
A It was thick.
Q Your goals were to make a flat card.
A I was told to make a smooth card with the surface smoothness they wanted of one half a thousandths of an inch --